

Attachment 13

HAZARDOUS WASTE INSPECTION

The following highlighted records need to be available for this hazardous waste inspection:

- ☒ Applicable Permits (Part A or Part B) *from Master Audit package*
- ✓ ☒ Waste Analysis Plans and Records *records spot checked*
- ✓ ☒ Manifests
- ✓ ☒ Manifests Discrepancies (record all discrepancies, including manifest number, transporter, TSD facility, ID number, waste type, quantity)
- ___ Unmanifested Waste Reports
- ✓ ☒ Annual Reports
- ✓ ☒ Waste Inspection Logs
- ☒ Personnel Training Plan and Records *copying*
- ___ Preparedness and Prevention Plans
- ☒ Arrangements with local emergency authorities (familiarize with hazardous wastes handled at facility and review of layout)
- ✓ ☒ Contingency Plans and Emergency Procedures
- ✓ ☒ Operating Records
- ___ Groundwater Monitoring (if applicable)
- ✓ ☒ Closure and Post-closure Plans
- ___ Purchasing Orders/MSDSs
- ✓ ☒ Other waste related documents (financial assurance, closure cost estimates)
- ✓ ☒ Tank test data (done for last inspection report) *per M.M. tanks not integrity tested yet*
- ___ Air monitoring data for process vents (Applies only to TSDs with waste distillation, fractionation, thin-film evaporation, solvent extraction, steam stripping and air stripping of 10 ppmw or greater organic hazardous waste)

7/12/91

* Chevron - Approval # 930360RH
Waste Tally # 030728 DM 3-8
rec'd - 7/28/93 - ~~unable to locate~~
time of inspection -

Shell Oil - Approval # 930320SH ✓
Waste Tally - # 030723 DM-17
rec'd - 7/23/93 -

BP Oil Alliance - Approval # 930409RH ✓
Waste Tally - # 030701 DM 24-80
rec'd - 7/1/93 - ~~please copy~~
entire file -

Chevron - 030727 VSC2-9 ~~unable to locate~~
(letter of correction) & time of inspection -

SES Seattle -
App # 920209NH ✓
Tally # 030816 ASC3 - 3 - reviewed by me ✓
rec'd 8/16/93

Santa Fe Pacific Pipelines ✓ - reviewed by me ✓
App # 930456RH
Waste Tally # 030816 DM 14-16

→ Analytical data on sludge removed from Recycle Water Storage Tank.

→ ↓ classified as DQIS based on
knowledge, per MM - no testing.

- copy of Ray Dalton's trng. records -

→ Waste -

• today - operating record -

Attachment 11

**CONTINGENCY PLAN
WESTATES CARBON-ARIZONA, INC**

2523 Mutahar Street
Parker, Arizona 85344
Phone: 602-669-5758

A WHEELABRATOR TECHNOLOGIES COMPANY

Contingency Plan

Table of Contents

Nature of Facility	8-1
Nature of the Wastes	8-1
Contingency Plan	8-1
Explosions and/or Fires	8-2
Unplanned Release of Hazardous Wastes	8-3
Personal Injury	8-6
Responsibilities of Emergency Coordinator	8-9
Responsibilities of the Operator	8-11
Emergency Response Procedures	8-12
Safety and Emergency Equipment	8-14
Facility Evacuation Criteria	8-15
Off-Site Emergency List	8-16
Safety and Emergency Equipment Locations	8-17
Evacuation Plan	8-18

CONTINGENCY PLAN

Nature of Facility. Westates Carbon-Arizona operates a facility for storage and treatment (reactivation) of used (or "spent") activated carbon. Activated carbon contaminated with a variety of industrial wastes is received and stored at the facility prior to reactivation. Reactivated carbon is also stored at the facility. The facility is operated by a staff of skilled personnel who are knowledgeable about the wastes, the reactivation process, and the storage procedures. Reactivation of carbon is performed in a multiple hearth furnace equipped with air pollution control devices. It should be noted that concentrated sulfuric acid and caustic are used in the process. No other special chemicals are required.

Nature of the Wastes. The wastes consist of granular activated carbon which has been used to adsorb a variety of waste products in a broad variety of industrial processes. The wastes are received in containers (drums or special sacks) or in tank truck loads. Wastes normally are dry, but may contain relatively small quantities of free liquids. Normally, these liquids consist of water mixtures. Both nonhazardous and hazardous waste are accepted at the facility; therefore, facility operations are regulated under the treatment, storage, and disposal requirements of the Resource Recovery and Conservation Act (RCRA) which is administered by the U.S. Environmental Protection Agency (U.S. EPA).

Contingency Plan. This Contingency Plan has been developed to minimize hazards to human health and/or the environment from fires, explosions, or any unplanned release of hazardous waste into the environment. The provisions of the plan will be implemented immediately whenever there is a fire, explosion or release of hazardous waste which could threaten human health and/or the environment.

1. Content of the Contingency Plan

- a. Facility Personnel Emergency Response. Specific response instructions for employees are presented later in this plan. The strategy for response to emergencies is presented here.

Note: No employee will take an active role in responding to an emergency unless he/she has completed the 40 hour initial training program for hazardous waste handlers described in Section 7 of the Health and Safety Plan. Any employee who has not completed this program will immediately notify management as necessary and remain in a clear area as instructed by management until the emergency has passed. Any qualified employee discovering an emergency shall attempt to control the emergency with the resources at hand if he/she can do so without risk to his/her safety and health and the safety and health of others. Any qualified employee discovering a fire, explosion, or hazardous waste release that is not readily controllable with the equipment and material at hand must immediately report this occurrence to Westates Carbon management. The management will contact the Emergency Coordinator and appropriate agencies who will then provide further emergency response assistance.

When an outside agency responds to an incident or accident at Westates, it is expected that an Incident Command System would be established by the responding agency. In almost all cases the C.R.I.T. Fire Department would be the responding agency. It is expected that the senior fire department official would assume the role of Incident Commander, under an I.C.S. Westates Carbon would provide assistance to the Incident Commander and would follow the instructions of the Incident Commander regarding the incident or accident.

Normally, the facility will be staffed by Westates Carbon personnel 24 hours a day, 365 days a year. However, if the facility is shut down for any reason and any emergency occurs during non-business hours, the responding fire or police department are requested to contact the Emergency Coordinator.

The general emergency response procedures for fire, explosions, and release of hazardous waste to air, soil, and surface water are described below. Specific procedures for response to plant emergencies are presented in Table 8-1.

- 1) Explosions an/or Fires. In the event of an explosion or fire, the following actions shall be taken as appropriate.

- a. Any person discovering a fire/explosion shall immediately contact Westates Carbon management. If an immediate contact with Westates Carbon management is not possible, contact the **C.R.I.T. Fire Department** by dialing **662-4388**.

He/she shall also determine the nature, and source of the fire, to the extent he/she can do so without significant risk to him/herself or others.

- b. The management will contact the Emergency Coordinator and will assist in contacting appropriate emergency response agencies as determined necessary by the Emergency Coordinator. Contact the C.R.I.T. Fire Department pursuant to procedures established therewith even if Westates Carbon capabilities are adequate to extinguish the fire. The fire department is expected to establish and Incident Command System. Westates Carbon will follow the Incident Commander's directions and cooperate fully therewith.

- c. The Emergency Coordinator shall:

- 1)) Remove all nonessential personnel and equipment from the vicinity of the fire.
- 2)) Access available equipment and supplies, and trained personnel for use in responding to the incident. Emergency response equipment is located throughout the facility as shown in Figure 8-1. A list of all emergency response equipment is provided in Table 8-2.

3)) Utilize designated and certified Westates Carbon personnel, and/or allow fire department personnel and available equipment to control and/or extinguish any fire and to reduce the chance of further explosion. This includes use of fire extinguishers and water if appropriate. The cause of the explosion or fire shall be determined and corrected.

4)) If required, close down all or part of the facility.

2) Unplanned Release of Hazardous Wastes

a) Release of Toxic Emissions (Releases to the Air). If fumes are detected, or if there is any indication of the possible presence of toxic fumes, the following actions shall be taken as appropriate:

1)) Determine the nature, source, and location of the fumes and sound the nearest facility alarm horn or announce the emergency via the plant intercom system. Immediately correct the problem, if possible, and contact the management.

2)) If the fumes are verified, operations shall cease, and all personnel will be removed to a well ventilated location until the situation is corrected.

3)) The Emergency Coordinator will immediately assess the possible hazards and implement additional emergency procedures if applicable. Proper respiratory protection equipment shall be worn, and confined space entry procedures shall be observed. In the event that public health or safety could be impacted outside the facility boundary, the Emergency Coordinator shall **immediately notify the C.R.I.T. Fire Department by dialing 662-4388 and the National Response Center at 800-424-8802.**

He/she must also notify the **C.R.I.T. Environmental Compliance Officer at 669-9211.** The Environmental, Health and Safety Manager may make other state and local notifications, at his/her discretion.

b) Waste Release of Solids

1)) Within Containment Area. The following steps are to be followed in the event of a release of solid material within the containment area.

i. Locate source of release and stop release.

ii. Clean up released material and place in drum. Take filled drum to storage area and label properly.

iii. Hose down the area of the spill, direct water to the nearest sump.

- iv. Clean any tools used during clean up. Cleaning solution used for clean up is to be put in sump.
 - v. The Emergency Coordinator will inspect the area to identify any further clean up requirements and instruct as to the disposition of the released materials place in drums.
- 2)) Outside Containment Area. The following steps are to be followed in the event of a liquid release within the containment area.
 - i) Locate source of release and stop release.
 - ii) Clean up release material, and any other materials in the release area that may have come into contact with released material, and place in drum. Take filled drum to storage area and label properly.
 - iii) Clean any tools used during clean up. Cleaning solution use for clean up is to be put in the sump.
 - iv) The Emergency Coordinator will inspect the area to identify any further clean up requirements and instruct as to the disposition of the materials placed in drums.
- c) Waste Release of Liquids
 - 1))
 - i. Locate source of release and stop release if possible.
 - ii. Allow free liquids to flow to the nearest sump.
 - iii. After as much free liquid as possible has been drained to the sump, place any remaining solid material in a drum. Take filled drum to storage area and label properly.
 - iv. Hose down the area of the spill, directing water to the nearest sump.
 - v. Clean any tools used during clean up. Cleaning solution used for clean up is to be put in the sump.
 - vi. The Emergency Coordinator will inspect the area to identify any further clean up requirements and instruct as to the disposition of any released material placed in drums.
 - 2)) Outside Containment Area (15 gallons or less). The following steps are to be followed in the event of a liquid release outside the containment area that is 15 gallons or less.

- i) Locate source of release and stop release if possible.
 - ii) Contain liquid in as small an area as possible.
 - iii) Use absorbent materials to collect any free liquid. Place used absorbent material in a drum.
 - iv) Collect and place in drum any other materials in the release area that may have come into contact with released material.
 - v) Place drums in storage area and label properly.
 - vi) Clean any tools used during clean up. Tool cleaning is to be performed within containment area and the cleaning solution is to be put in the sump.
 - vii) The Emergency Coordinator will inspect the area to identify any further clean up requirements and instruct as to the disposition of any material collected during the clean up.
- 3)) Outside Containment Area (in excess of 15 gallons). The following steps are to be followed in the event of a liquid release outside the containment area that is in excess of 15 gallons.
- i) Locate source of release and stop release if possible.
 - ii) Contact the Emergency Coordinator. The Emergency Coordinator will coordinate the following actions:
 - a)) The contacting of any emergency response agencies.
 - b)) The removal of all nonessential personnel and equipment from the vicinity of the release.
 - c)) The provision of equipment and supplies appropriate for use in responding to the incident.
 - d)) The utilization of adequately trained Westates Carbon personnel and equipment and/or fire department personnel to contain the release in the smallest possible area. Absorbents, earth, and/or containment boom material may be used as appropriate.
 - e)) The immediate notification of the C.R.I.T. Fire Department and the National Response Center if a release could impact public health or safety outside the facility boundary. Also, the C.R.I.T. Environmental Coordinator must be notified whenever a spill contacts or threatens to contact surface waters off site.

- f)) The initiation of the shut down of all or part of the facility.
 - g)) The collection of the released material, any soil that came into contact with the released material, and any absorbents in drums and the placement of properly labeled drums in the storage area.
 - h)) The inspection of the release area to ensure it is properly cleaned.
 - i)) The determination of the final disposition of any material place in drums during the clean up.
- 3) Personal Injury. Should person be injured for any reason, immediate steps will be taken to determine the cause and extent of the injury and to apply first aid and/or decontamination if appropriate. The management will be notified immediately and paramedics will be called if required. If necessary, the injured person will be transported to the Parker Community Hospital. If exposure to a hazardous waste is involved, a copy of the waste manifest, together with any appropriate safety data, will be sent along, and the Emergency Coordinator shall remain available for consultation.
 - a) In accordance with company policy, any person who receives an on-the-job injury will be required to report the injury to Westates Carbon management, have medical attention, and receive a medical approval prior to resumption of his/her duties.
 - b) Coordination of Emergency Services. Once the contingency plan has been distributed to the agencies as required in Section 8.A.2.c., all pertinent authorities and emergency response services, including the local police department, fire department, and state and local emergency response teams, will be contacted to:
 - 1)) Familiar them with the layout of the facility, the properties of the hazardous wastes handled, access within the facility and evacuation routes;
 - 2)) Establish agreements as necessary with responding local police and fire departments to designate primary emergency authority and support;
 - 3)) Establish agreements with state emergency response teams, and emergency response contractors;
 - 4)) Make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries which could result from fires, explosions, or releases at the facility.
 - c) Emergency Coordinator and Alternates

The Emergency Coordinator is:

Name: Monte McCue
Address: 2523 Mutahar Street; Parker, Arizona
Telephone: 602-669-5758
Home Address: 790 South Acoma Blvd.; Lake Havasu City, Arizona
Home Phone: 602-680-7445
Pager: 602-669-8757 #7572

The Alternate Emergency Coordinators are:

Name: Jeffrey Walsh
Address: 2523 Mutahar Street; Parker, Arizona
Telephone: 602-669-5758
Home Address: 3120 Silver Saddle Drive; Lake Havasu City, Arizona
Home Phone: 602-453-7536
Pager: 602-669-8757 #2163

Name: Delton Griffith
Address: 2523 Mutahar Street; Parker, Arizona
Telephone: 602-669-5758
Home Address: P.O. Box 281; Bouse, Arizona
Home Phone: 602-851-2382
Pager: 602-669-8757 #7676

d) Location, Physical Description, and Capabilities of Emergency Equipment. See Table 8-2 for the equipment list.

1)) Fire extinguishers. Dry chemical fire extinguishers are located in the facility as listed in Table 8-2. Locations of fire extinguishers are also shown on Figure 8-1.

2)) Spill Control Equipment. Absorbent materials and spill cleanup equipment are available at the facility as shown on Figure 8-1. These materials include:

- * Wet/Dry Shop Vacuum Cleaner
- * Inert Absorbents
- * Absorbent pads and/or booms
- * Shovels
- * Neutralizing agents (soda ash, lime)
- * Sand bags

Portable pumps are also available for recovery of spill liquids. Forklifts are available for moving palletized absorbent materials and removing containerized spill clean up residues.

3)) Communications Equipment. The facility is expected to be occupied at all times. Telephone service is available at several locations in the plant

(Figure 8-1) and will be used to summon aid. The Emergency Coordinator or his/her alternate shall remain available (on call) when they are not present at the facility.

- 4)) Alarm Systems. There is an alarm system with activation points in the processing building and the warehouse. An alarm system will also be activated if the sprinkler system is activated.

The fire department or other outside response team will notify any neighboring population if it is determined that an incident or accident could necessitate their evacuation.

- 5)) Decontamination Equipment. Figure 8-1 indicates the location of emergency showers and eyewash stations provided for decontamination of personnel. Detergents are provided for decontamination of equipment and facilities as necessary.

- e. Capabilities of Emergency Equipment. Emergency equipment, including spill response equipment, decontamination equipment, fire extinguishers, first aid kits, alarms, and communications equipment are listed in Table 8-2 and shown on Figure 8-1.

- f. Employee Evacuation. All personnel will be alerted by voice over the plant public address system or directly by supervisory personnel if an accident or incident occurs which requires evacuation of the facility. Employees will be advised immediately if evacuation is required as determined by criteria in Table 8-3, and will be directed to leave via established routes to a safe upwind location where they will muster. Evacuation routes and the designated assemble point are shown in the Emergency Response Plan, Figure 8-2.

Normally, all egress points from the building and the fenced boundary will be easily opened from the inside to facilitate evacuation. However, the Emergency Coordinator will ensure that all necessary egress points (gates and doors) are not obstructed and are available for use.

2. Updating and Distribution of the Contingency Plan

A current copy of this Contingency Plan will be maintained at the facility. Copies will also be distributed to:

- * Emergency Coordinator
- * Alternate Emergency Coordinators
- * Colorado River Indian Tribes Fire Department
- * Colorado River Indian Tribes Police Department
- * Parker City Fire Department
- * Parker City Police Department
- * Parker Community Hospital

3. Amendment of Contingency Plan

The Contingency Plan will be reviewed and amended, if any of the following occurs:

- a. The facility permit is revised
- b. The plan fails in an emergency
- c. The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially alters the potential for fires, explosions, releases of hazardous wastes or hazardous waste constituents, or changes the response necessary in an emergency
- d. List of Emergency Coordinators changes
- e. List of emergency equipment changes
- f. Applicable regulations are revised

Responsibilities of the Emergency Coordinator

1. Availability

An emergency Coordinator will be available at all times to direct emergency procedures. He/she will normally be at the facility during daytime hours. If the facility is closed, or the Emergency Coordinator is not at the site, he/she shall be on call and shall be contacted immediately in an emergency.

The Emergency Coordinator shall be thoroughly familiar with all aspects of this Contingency Plan, all operations and activities at the facility, the location and characteristics of wastes handled, and the location of all record within the facility. In addition, this person shall have the authority to commit the resources needed to carry out the Contingency Plan.

2. Responsibility in an Emergency

The Emergency Coordinator is responsible for coordinating all emergency response measures at the facility.

- a. Notification. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator or his/her alternate will immediately alert all personnel at the facility via the public address system or other direct means if necessary. He/she will also notify appropriate state and local agencies with designated response roles if their assistance is needed.
- b. Assessment of Health Effects. Concurrently, the Emergency Coordinator will assess the possible hazards to human health or the environment caused by fire, explosion, or released materials. The assessment will consider the direct and indirect effects of the fire or explosion and agent used to control fires or

explosions (i.e., toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). The Emergency Coordinator will alert facility personnel of an actual or impending emergency.

- c. Off-Site Health Effects. Should an emergency threaten the human health or the environment outside the facility boundaries, the Emergency Coordinator will report the findings as follows:
 - 1) If evacuation is required, notify the Colorado Indian Tribes Fire Department, the Tribal Environmental Compliance Officer, and the Parker Fire Department.
 - 2. Notify the National Response Center and provide the following information:
 - * Name of reporter
 - * Telephone number of reporter
 - * Name of and address of the facility
 - * Time of incident
 - * Type of incident (i.e., fire)
 - * Name of material(s) involved
 - * Quantity of material(s) involved
 - * Extent of injuries, if any
 - * Possible hazards to health or environment outside the facility
- d. Prevention of Spread or Recurrence of Emergency. It is the responsibility of the Emergency Coordinator to take all reasonable measures to ensure that an incident is contained. He/she must also maintain surveillance on other areas of the facility to make certain that they are not affected by pressure in pipes, leaks, or gas generation in other areas. Appropriate monitoring must be initiated.
- e. Monitoring. If the facility stops operation in response to an emergency condition, the Emergency Coordinator will monitor the affected areas for imminent hazards.
- f. Treatment, Storage, and Disposal of Contaminated Materials. After an emergency is over, the Emergency Coordinator will provide for clean up, treatment, storage, and disposal of the recovered waste, contaminated material, and/or contaminated surface water.
- g. Completion of Cleanup. Prior to handling any wastes which are incompatible with the released materials, or materials and equipment used in responding to the emergency, the Emergency Coordinator will ensure that the cleanup is complete and the affected facilities and equipment are returned to a safe condition. No waste that may be incompatible with the released material may be treated, stored, or disposed until cleanup procedures are completed.

- h. Emergency Equipment. The Emergency Coordinator shall ensure that all emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operation are resumed.

Responsibilities of the Facility Operator

1. Notification

Westates Carbon is the owner and Wheelabrator Environmental Systems Inc. is the operator of the facility and will notify the U.S. Environmental Protection Agency Region IX at 415-974-8131 that any cleanup resulting from an emergency is complete before the facility resumes operation.

2. Operation Record

If the Contingency Plan is implemented, Westates Carbon will record in the operating record, the date, time, and details of the incident.

3. Incident Report

Should any emergency occur at the facility, a written report of the incident will be submitted to the U.S. EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901 within 15 days. The following information will be included in the report:

- * Name, address, and telephone number of the owner or operator
- * Name, address, and telephone number of the facility
- * Date, time, and type of incident
- * Name and quantity of material(s) involved
- * Extent of injuries, if any
- * Assessment of actual or potential health or environmental hazards, if applicable
- * Estimated quantity and disposition of recovered material resulting from the incident

Table 8-1
Emergency Response Procedures

Fire and Explosion

1. Upon discover a fire or explosion, sound the alarm. Ensure that Westates Carbon management and the Colorado Indian Tribes Fire Department have been notified. Follow the directions of the Emergency Coordinator and offsite Incident Commander.
2. Clear area of all unnecessary personnel.
3. Trained employees only (see note below) undertake the following actions only if you can do so without significant risk to yourself and others.
 - a. Shut off the fuel source to the fire, if possible
 - b. Attempt to control the fire with dry chemical fire extinguisher (Class A, B, C fires) and/or use water (Class A fire).
 - c. Shut off any operating equipment, treatment processes, etc. in the vicinity of the fire.
 - d. Shut off electrical power in the area affected by the fire.
 - e. If flammable materials are involved, remove all other sources of ignition in the vicinity of the fire.
 - f. Isolate or remove other fuel sources in the vicinity of the fire, if possible (containers of flammables, etc.).

Release of Toxic Fumes or Vapors

If toxic fumes or vapors are believed to be present, proceed as follows:

1. Stop the transfer or treatment operation. Report the incident to Westates Carbon management. Ensure that the Emergency Coordinator has been notified. If public health or safety outside the facility boundaries could be affected, the Emergency Coordinator will ensure that the Colorado River Indian Tribes Fire Department and the National Response Center are notified.
2. Clear the area of all unnecessary personnel.
3. Perform the following actions, if possible, without significant risk to yourself or others:
 - a. Discontinue the waste transfer operation by closing appropriate valves and de-energizing transfer equipment.
 - b. Secure the lids on any open waste containers.
 - c. Remove all sources of ignition from the area.

Note: Employees who receive 40 hours of initial training in hazardous waste management as described in Section IX of the Operation Plan prior to the commencement of duties at Westates Carbon will be considered to have been trained to a sufficient level of awareness per 29 CFR 1910.120(p)(8)(iii). He/she should have sufficient knowledge to actively respond to hazardous materials and hazardous waste emergencies at the facility.

Table 8-1 (continued)
Emergency Response Procedures

Release of Toxic Fumes or Vapors (continued)

4. Re-enter the area and/or resume operation only after the Emergency Coordinator has determined the cause of the release, corrected the problem, and has determined that the area is safe for re-entry. Consideration will be given to both the presence of toxic vapors and the adequacy of oxygen supply. Wear the proper protective clothing and respiratory protection equipment, as determined by the Emergency Coordinator.
5. Resume transfer or treatment operations only after approval of the Westates Carbon management.

Small Release

1. Stop the release if you can do so without risk.
2. Contain the release in the smallest possible area by berming with inert absorbent. Add sufficient absorbent to eliminate free liquids.
3. Place any contaminated material in a properly marked drum.
4. Report the incident and all corrective actions to Westates Carbon management.

Large Release

1. Stop leak if you can do so without risk.
2. Sound the alarm. Report the incident to Westates Carbon management. Ensure that the Emergency Coordinator has been notified. The Emergency Coordinator will ensure that the Colorado River Indian Tribes Fire Department and the National Response Center are notified if the incident could affect public health or safety outside the facility boundaries.
3. Remove unnecessary personnel from the vicinity.
4. Perform the following action is possible without significant risk to yourself or others:
 - a. Dike ahead of the spill to contain it within the smallest practical area. Dike as necessary to prevent entry of spill materials to the storm drain system if the spill occurs outside the secondary containment area.
 - b. Remove all sources of ignition from the area.
 - c. Secure all waste transfer and treatment operations in the area by turning off pumps and closing valves as necessary.
5. If volatile wastes are involved or the incident produces a vapor release, respond in accordance with the procedures for a vapor release incident.
6. Clean the spill material with shovels, pumps, or powered equipment as necessary. Dispose of wastes by treatment onsite (if suitable) or transportation to an appropriate off-site facility with appropriate documentation.

Note: Employees who receive 40 hour training in hazardous waste management as described in Section IX of the Operation Plan prior to commencement of duties at Westates Carbon will be considered to have been trained to a sufficient level of awareness per 29 CFR 1910.120(p)(8)(iii). He/she should have sufficient knowledge to actively respond to hazardous material and hazardous waste emergencies at the facility.

TABLE 8-2
SAFETY AND EMERGENCY EQUIPMENT

EQUIPMENT TYPE	QUANTITY	BRAND/MODEL	CAPABILITIES/SPEC
AIR PACK	2	SCOTT/AIR PAK 22	30 MINUTE
AIR PACK	1	LIFAIR-5	5 MINUTE
FIRE EXTINGUISHERS	9	AMEREX	10 POUND ABC
RESPIRATORS	ASSIGNED TO EACH WASTE HANDLING EMPLOYEE PLUS SPARE UNITS	SCOTT/65	WITH PARTICULATE AND ORGANIC FILTERS
PROTECTIVE CLOTHING- HARD HATS, GLOVES, SAFETY GLASSES, FACE SHIELDS, APRONS	ASSIGNED TO EACH EMPLOYEE AS REQUIRED PLUS SPARE UNITS	HARD HATS-MODEL L.R. GLOVES-BEST NEOPRENE AND SURGICAL GLOVES	
FIRST AID KITS	1	ZEE MEDICAL	GENERAL
SPILL CONTROL KITS	1	SPILFYTER	95 GALLON
SPRINKLER	2	GRINNEL	314 GPM @ 22.1 PSI
FIRE HOSE RACKS	2	NONE	CITY WATER
TELEPHONES W/PAGING SYSTEM	6	DBA SMARTALK 308	PAGE THROUGHOUT THE PLANT
EMERGENCY ALARM WITH FOUR ACTUATORS	1	FIRE LITE/MINISCAN 4024	
FIRE ALARM SYSTEM-MANUAL AND AUTOMATIC	1	FIRE LITE	PULL SWITCHES
WET/DRY VACUUM	1	U.S. TURBINE CORP.	

Table 8-3
Facility Evacuation Criteria

In the event that a hazardous waste incident would pose an imminent threat to personnel, health, life or safety, the Emergency Coordinator will evacuate the facility or portions of the facility affected by the incident. If evacuation is warranted, the Emergency Coordinator will advise local public safety agencies of the potential threat to persons in the vicinity of the facility. In all cases when local fire or police departments respond, the Emergency Coordinator shall cooperate fully and comply with their instructions to the best of his/her ability.

Situations which would warrant partial or complete evacuation of the facility are as follows:

Explosions: Actual or imminent explosion would require an evacuation due to potential toxic emissions, heat, pressure, and flying debris. At a minimum, personnel will evacuate to the designated assemble point indicated on the Evacuation Plan. A greater distance from the hazard or potential hazard may be warranted by flying debris or the presence of toxic fumes or may be requested by the fire department.

Releases or Adverse Chemical Reactions: The major threat from releases or adverse reactions is considered to be toxic fumes. Evacuate all personnel not equipped with appropriate respiratory protection equipment in an upwind direction to a point where they are clear of the fumes.

Fire: Fire presents a threat because of heat and toxic fumes. Evacuate all personnel to the designated assemble point. Respond to instructions from the fire department as necessary.

All Other Incidents: Evacuate personnel from the facility and vicinity whenever their personnel health and safety cannot be adequately protected.

Table 8-4
Off-Site Emergency Services List

U.S. EPA Region IX	415-974-8131
C.R.I.T. Fire Department	602-662-4388
C.R.I.T. Police Department	602-669-9277
Parker Fire Department	602-667-3333
Parker Police	602-669-2264
Arizona Highway Patrol	0
California Highway Patrol	0
Parker Community Hospital	602-669-9201
Southwest Gas	800-528-4277
BIA-Power Company	602-669-7123
C.R.I.T. Environmental Coordinator (Conner Byestewa)	602-669-9211
National Response Center	800-424-8802

Figure 8-1

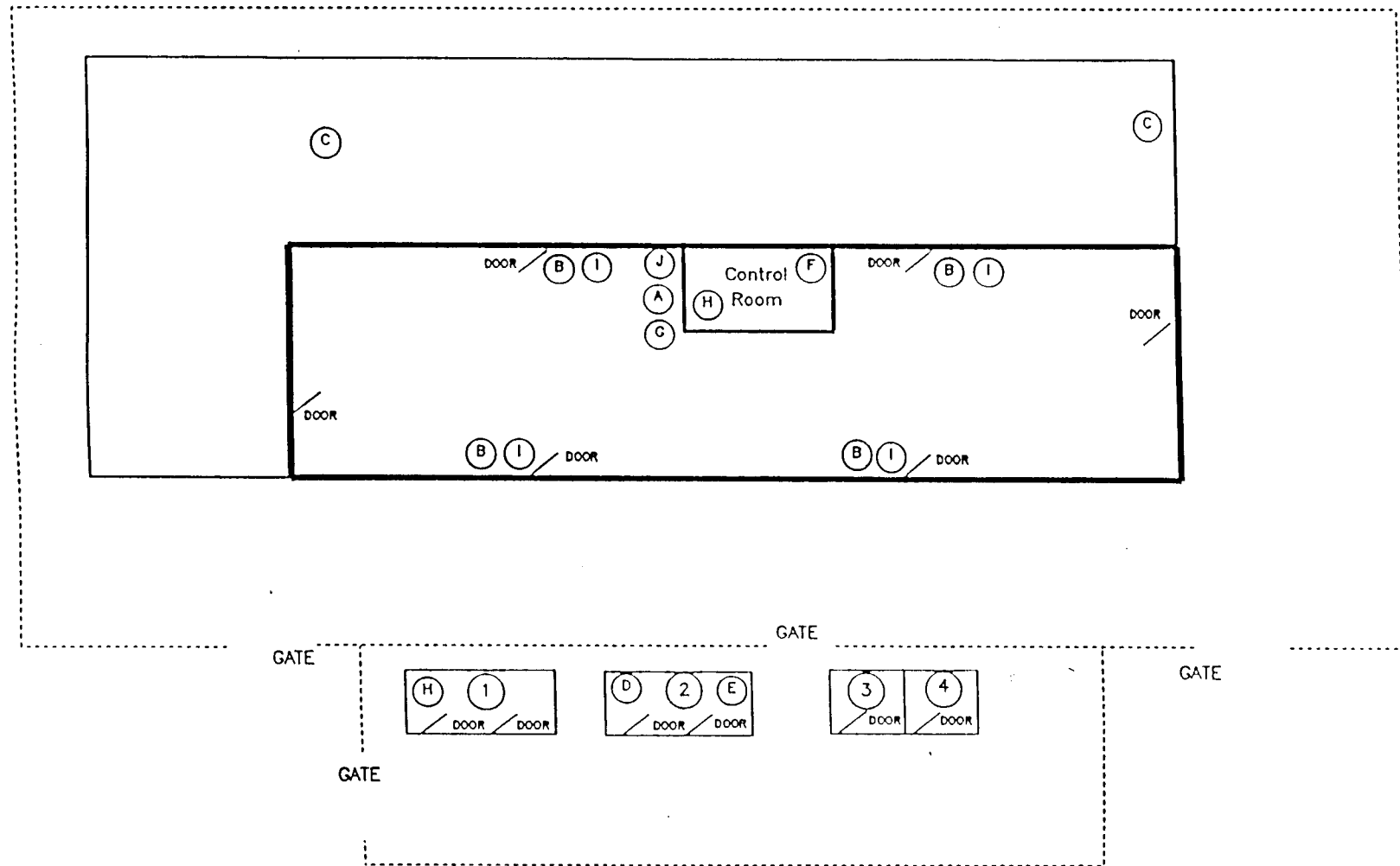
SAFETY AND EMERGENCY EQUIPMENT LOCATIONS

WESTATES CARBON - ARIZONA, INC.

PARKER, ARIZONA



8-17



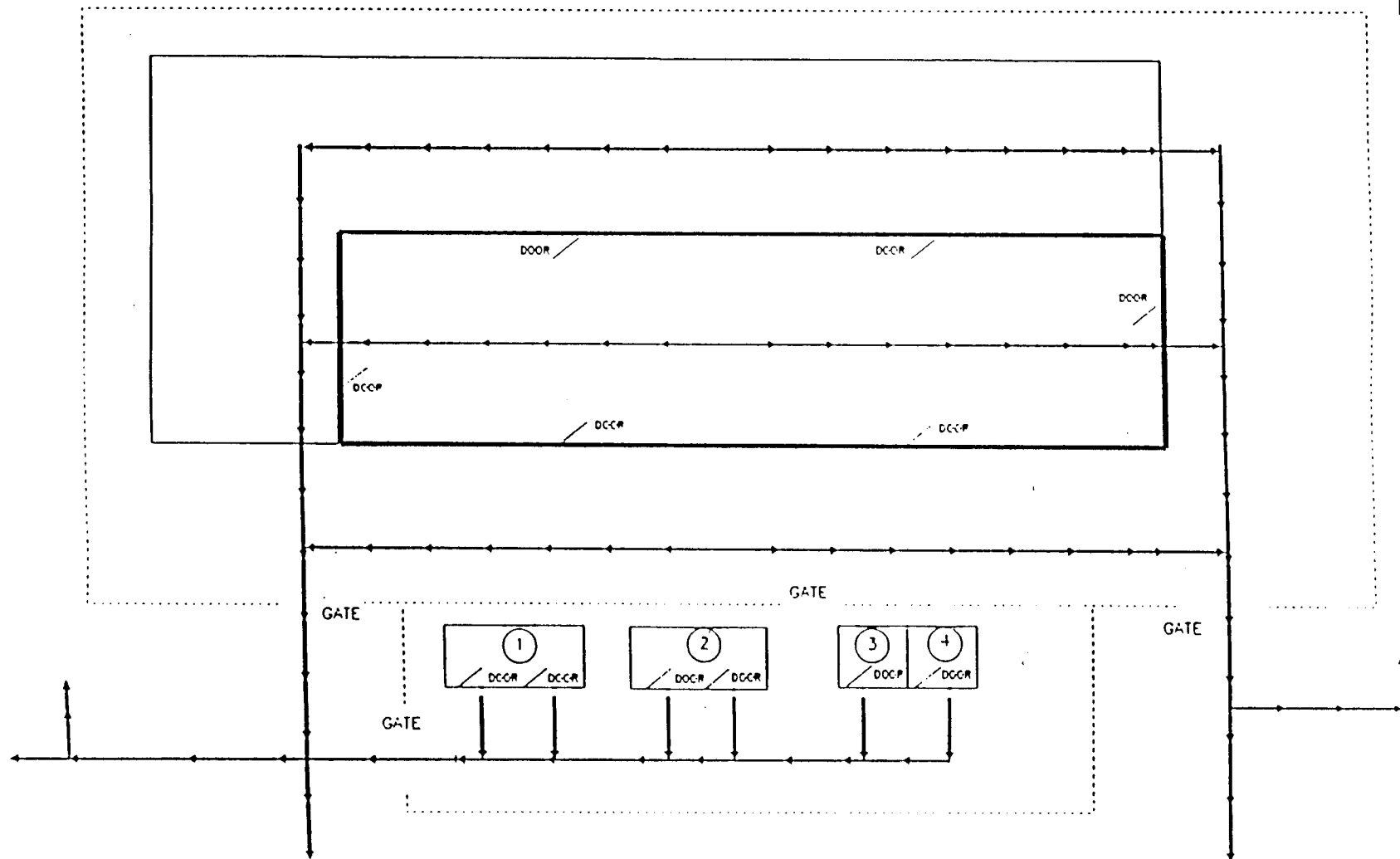
(A) Air Packs	(F) First Aid Kits	LEGEND: ----- Fence _____ Outside Process Area _____ Storage, Control & Maintenance Building	(1) Admin. Offices
(B) Fire Extinguishers	(G) Spill Control Kits		(2) Change Room/Shower
(C) Emerg. Showers/Eyewash	(H) Phones w/Paging		(3) Break Room
(D) Respirators	(I) Fire Alarm		(4) Laboratory
(E) Protective Clothing	(J) Wet Dry Vacuum		

Figure 2

EVACUATION PLAN -- WESTATES CARBON -- ARIZONA, INC.
PARKER, ARIZONA

↑ N

8-18



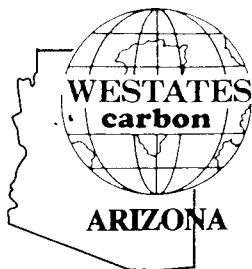
Proceed to nearest gate as indicated by evacuation route.
Once outside of fence proceed in a direction away from the hazard necessitating the need for evacuation and in a opposite the prevailing wind direction. The evacuation order will be given orally over the plant communications system.

LEGEND:

- Fence
- Outside Process Area
- Evacuation Route
- Storage, Control & Maintenance Building

- ① Admin. Offices
- ② Change Room/Shower
- ③ Break Room
- ④ Laboratory

Attachment 12



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

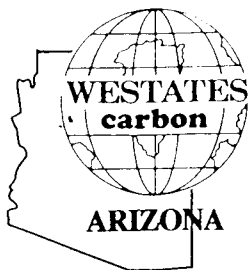
A Wheelabrator Technologies Company

I, KITTY LITTLE representing
C.R.I.T. FIRE DEPARTMENT have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: Kitty Little Date 6-17-93



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

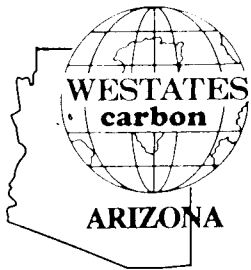
A Wheelabrator Technologies Company

I, CHRIS HARPER representing
CRIT FIRE Department have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: Chris S. Harper Date 6-17-93



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

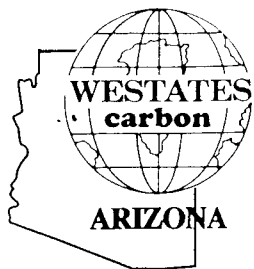
A Wheelabrator Technologies Company

I, *LT. Randall Stewart* representing
CRIT PD have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: *LT. Randall Stewart* Date *6-17-93*



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

A Wheelabrator Technologies Company

I, KARL HARTMETZ representing
PARKER FIRE DEPT have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

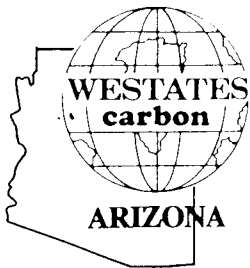
- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: _____

Date _____

17 June 93



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

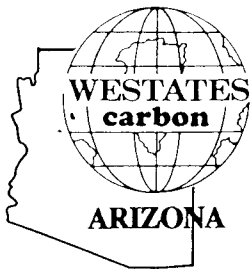
A Wheelabrator Technologies Company

I, Ralph Beaulieu representing
Parker Fire Dept have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: Ralph Beaulieu Date 6-17-93



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

A Wheelabrator Technologies Company

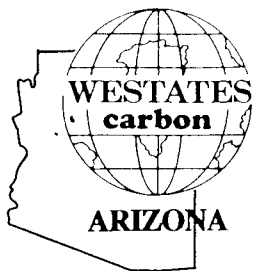
I, Lia Valenzuela representing
Parker Police Dept have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: Sgt. R. Valenzuela

Date 6-17-93



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

A Wheelabrator Technologies Company

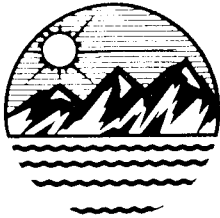
I, WILLIAM COE representing
PARKER COMMUNITY HOSP. have visited the Westates Carbon-Arizona,
Inc. reactivation facility located at 2523 Mutahar Street in Parker, Arizona and have been
familiarized with the following:

- 1) Layout of the facility.
- 2) Properties of the hazardous waste handled at the facility and associated hazards.
- 3) Places where personnel would normally be working.
- 4) Entrances into the facility.
- 5) Exits to the facility.
- 6) Possible evacuation routes.
- 7) Possible injuries or illnesses which could result from fires, explosions or releases at the facility.

I have also been given a copy of the Contingency Plan for our office files. I am aware that the Colorado River Indian Tribes Fire Department is expected to establish an Incident Command System.

Signed: _____

Date _____



Parker Community Hospital

8 July 1992

Mr. Monte McCue
West States Carbon
2523 Mutahar
Parker, Az. 85344

Dear Mr. McCue:

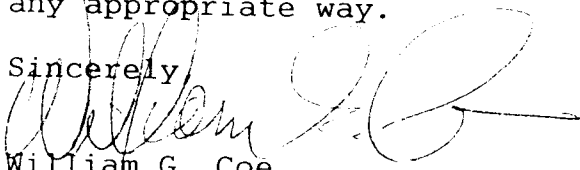
In response to your inquiry and pursuant to our telephone conversation 2 July 1992, I am pleased to advise that Parker Community Hospital is a duly licensed general hospital with an Advanced Life Support base station giving medical direction to six fire department/rescue and/or ambulance services throughout LaPaz County.

Many of the prehospital personnel of these agencies have had special hazardous materials training and the emergency department has an outside decontamination area adjacent to the emergency department.

The Medical Staff of the emergency department work closely with the Poison Control Center and other appropriate agencies when necessary to treat patients with hazardous materials exposure.

Should the need ever arise, please be assured that the staff at Parker Community Hospital stands ready to serve your employees in any appropriate way.

Sincerely,


William G. Coe
Chief Executive Officer

WGC/lis

RECEIVED JUN 10 1992

River Medical, inc.

24Hour Emergency Ambulance Service
PARKER • LAKE HAVASU • QUARTZSITE • KINGMAN

Subscription Service Available
1987 McCulloch Blvd., Ste.# 202
Lake Havasu City, AZ
86403

(602) 855-4104
FAX (602) 855-4141

JULY 17, 1992

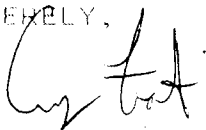
WESTATES CARBON COMPANY

TO WHOM IT MAY CONCERN:

PLEASE LET THIS SERVE AS EVIDENCE OF OUR INTENT TO PROVIDE
EMERGENCY AMBULANCE SERVICE TO WESTATES CARBON COMPANY,
LOCATED IN PARKER, ARIZONA. UNDER NORMAL CIRCUMSTANCES
OUR ETA TO THIS LOCATION IS BETWEEN 5 TO 7 MINUTES. THE
AREA THAT WESTATES CARBON IS LOCATED HAS BEEN SERVICED BY
OUR COMPANY FOR THE LAST 10 YEARS, AND NO INTERRUPTION IN
THIS SERVICE IS FORESEEN.

PLEASE FEEL FREE TO CONTACT ME SHOULD ANY QUESTIONS ARISE.

SINCERELY,

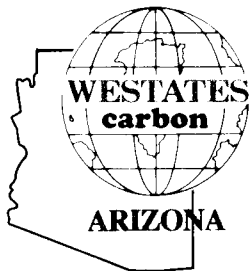


ANTHONY M. FOTI
VICE PRESIDENT

RECEIVED JUL 17 1992



Attachment 13



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

A Wheelabrator Technologies Company

SEP 20 1993

September 20, 1993

Ms. Amy Sokolov
Environmental Protection Specialist
Hazardous Waste Management Division
US ENVIRONMENTAL PROTECTION AGENCY
75 Hawthorne Street
San Francisco, CA. 94105-3901

Dear Ms. Sokolov:

I have enclosed a copy of two (2) Westates Carbon Arizona - Inc. (WCAI) employees personnel training records per your request. Below I have given you a breakdown of each individual training.

1. **BOOT CAMP:** Employees are introduced to WCAI in this 8 hour course. WCAI also conducted a " refresher " course in June of this year. Certificates were not awarded, but all employees did attend. Topics pertaining to 40 CFR 265.16 include; communication system, contingency plan, emergency equipment, waste feed cut-off and shutdown of operations.
2. **40 HOUR HAZARDOUS WASTE SITE WORKER TRAINING:** All WCAI employees must successfully complete. This training is completed within the first few weeks of employment. Employees are not allowed on the " Hot " side until this training is completed.
3. **8 HOUR HAZARDOUS WASTE SITE SUPERVISOR TRAINING:** All WCAI supervisors must complete.
4. **8 HOUR HAZARDOUS WASTE SITE REFRESHER TRAINING:** All WCAI employees must complete yearly.
5. **ON THE JOB TRAINING:** The training is dependent upon the employees specific job requirements.
6. **HAZARDOUS COMMUNICATION TRAINING:** All WCAI employees must complete prior to assumption of duties at WCAI.

7. **CPR/FIRST AID:** All employees as of July 21, 1992 were instructed in CPR/First Aid. WCAI is currently scheduling another training for new employees.

8. **PERMIT REQUIRED CONFINED SPACES:** All WCAI employees must complete prior to entering a confined space.

9. **FORKLIFT OPERATOR TRAINING COURSE:** All WCAI employees must complete. A WCAI supervisor is scheduled to attend a seminar in October to be able to train future WCAI employees.

10. **HEARING CONSERVATION PROGRAM:** Program was implemented in August of 1993. All WCAI employees must complete prior to assumption of duties at WCAI.

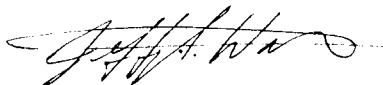
11. **PETROLANE LP-GAS TRAINING:** All WCAI employees that would be filling, or handling a container must complete.

12. **HAZARDOUS MATERIAL MANAGEMENT TRAINING:** I am currently enrolled in a certificate program pertaining to this topic.

13. **HAZARDOUS MATERIALS MANAGEMENT - HM 181:** I have successfully completed this course but am waiting for my certificate.

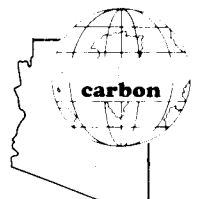
I have also attached a copy of the WCAI " Training Program ". If you have any questions or require additional information, please call me at (602) 669-5758.

Respectfully,



Jeffrey S. Walsh
Environmental, Health
and Safety Manager

cc: File



WESTATES CARBON - ARIZONA **EMPLOYEE JOB DESCRIPTION AND TRAINING RECORD**

Employee Name: JEFFREY S. WALSHJob Title: ENVIRONMENTAL COORDINATOR Hire Date: 05/21/92 Termination Date: _____Initial Training Completed: 06/10/92 IN CA.Dir. of Training Signature: ROBERT BABBITOJT Completed: 07/21/92 (Hire Date Plus 8 Weeks)Dir. of Training Signature: ROBERT BABBITJob Title: E/H/S MANAGER Promotion Date: 04/25/93Initial Training Completed: 06/93Dir. of Training Signature: ROBERT TOUMENANOJT Completed: CONTINUOUS (Hire Date Plus 8 Weeks)Dir. of Training Signature: ROBERT TOUMENAN

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____

Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks)

Dir. of Training Signature: _____

Other Training

Type	Date	Signature of Trainer	Type	Date	Signature of Trainer
Forklift	<u>03/12/93</u>	<u>JOHN COSTILLO</u>	<u>BOOT CAMP</u>	<u>07/92</u>	<u>SANDY MARSHALL</u>
First Aid	<u>07/21/92</u>	<u>MICHEAL BERNHARDT</u>	<u>40 HOUR</u>	<u>07/92</u>	<u>JOHN GILSTRAP</u>
CPR	<u>07/21/92</u>	<u>MICHEAL BERNHARDT</u>	<u>8 SUPERVISOR</u>	<u>08/92</u>	<u>JOHN GILSTRAP</u>

NOTE: This form must be kept in the employee's personnel file for the duration of employment plus three years after the termination date.
 If terminated, authorized destruction date: _____

WESTATES CARBON - ARIZONA **EMPLOYEE JOB DESCRIPTION AND TRAINING RECORD**

Employee Name: J WALSH

Job Title: _____ Hire Date: _____ Termination Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Other Training

Type	Date	Signature of Trainer	Type	Date	Signature of Trainer
Forklift	_____	_____	HAZ COMM	<u>10/19/92</u>	<u>MONTE McCUE</u>
First Aid	_____	_____	HMMT	<u>07/16/93</u>	<u>MICHAEL RANDALL</u>
CPR	_____	_____	HM 181	<u>07/93</u>	_____

NOTE: This form must be kept in the employee's personnel file for the duration of employment plus three years after the termination date.
 If terminated, authorized destruction date: _____

WESTATES CARBON - ARIZONA EMPLOYEE JOB DESCRIPTION AND TRAINING RECORD

Employee Name: J WALSH

Job Title: _____ Hire Date: _____ Termination Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Other Training

Type	Date	Signature of Trainer	Type	Date	Signature of Trainer
Forklift	_____	_____	REFRESHER	08/31/93	ALAN SEGNA
First Aid	_____	_____	HEARING	08/93	ALAN SEGNA
CPR	_____	_____	CONFINED SPACE	09/02/93	ALAN SEGNA

NOTE: This form must be kept in the employee's personnel file for the duration of employment plus three years after the termination date.
If terminated, authorized destruction date: _____ Page 3 of 3

**TABLE 7-5
JOB DESCRIPTIONS**

Plant Manager - The Plant Manager is responsible for overall management and production at the facility. He/she ensures that all waste handling operations are safely and correctly performed and that all regulatory requirements are met. He will ensure that the Contingency Plan is kept up to date and that employee training is performed in accordance with the approved training program. He will review all plant records, including the operating log and records of inspection and will ensure that this documentation is correctly performed and that records are maintained as specified by the permit and other applicable regulations.

Director of Training - The Director of Training is responsible for the administration of all operations and safety training programs. He/she will ensure that all company required operations training is performed and that training is properly documented. He will administer the HAZWOPER training and ensure that records are maintained in accordance with 29 CFR 1910.120, et. al. He will provide technical assistance to training instructors regarding personal protective equipment, industrial hygiene and related programs. For the foreseeable future, the Director of Training position will be filled by the Plant Manager.

General Foreman - The General Foreman directly supervises the carbon reactivation process, carbon handling operations, including warehousing, and other associated waste processing. He will instruct subordinate employees in the duties of their job and he will observe and evaluate their performance. He/she is directly responsible for the performance of operations in one or more specialty areas. He will inspect plant equipment and ensure that all plant systems, including alarm and emergency response systems are properly functioning.

Maintenance Supervisor - The Maintenance Supervisor is directly responsible for the operating condition of installed plant equipment and the physical condition of the entire facility. He will ensure that a schedule of routine maintenance is established and maintained, consistent with manufacturer's recommendations and good operating practices. He will ensure that adequate maintenance records are kept. He will train operating personnel, as necessary in the proper operation of installed equipment, to minimize downtime. He will respond to plant equipment breakdowns and other problems as required.

Maintenance Technician (Journeyman) - The journeyman will work under the direction of the Maintenance Supervisor to perform preventative and corrective maintenance. He will respond to plant breakdowns as required.

Maintenance Technician (Apprentice) - The apprentice will work under the direction of the maintenance journeymen in performing preventative maintenance and corrective maintenance on plant equipment. He will assist in maintaining the physical facility as required.

Environmental Compliance Manager - The Environmental Compliance Manager will work under the direction of the Corporate Environmental Health and Safety Director to ensure that all applicable environmental requirements are met. He/she will perform facility inspections and train other employees in the proper inspection of the facility. He/she will ensure that all environmental compliance records are properly maintained and that environmental reports are prepared for submittal in a timely fashion. He/she will assist the Plant Manager in responding to agency inquiries and will collect and record environmental data for the facility.

Environmental Coordinator - The Environmental Coordinator will handle customer waste profile applications and will coordinate and schedule delivery of spent carbon to the facility. He/she will maintain records for each customer regarding shipment and receipt of material. He/she will coordinate the shipment of reactivated carbon.

Laboratory Technician - The Laboratory Technician will perform routine waste screening analyses and will obtain samples and perform analyses related to process monitoring and environmental monitoring. He/she will assist in training other designated employees in obtaining samples. He/she will assist in reviewing waste profile applications and make recommendations as to whether wastes should be accepted. He/she will perform laboratory analyses on waste samples and process streams to determine plant operating parameters.

Lead Operator - The Lead Operator will be qualified to act as operator in charge of all equipment and processes on the work shift to which he is assigned. He/she will act under the direction of the General Foreman.

Operating Technician - The Operating Technician will operate plant treatment and waste handling equipment. He is responsible that his/her actions are properly performed and in accordance with established plant procedures and rules. He will inspect plant equipment and maintain documentation as directed by the Lead Operating Technician and the General Foreman.

Secretary/Receptionist - The Secretary/Receptionist will perform clerical functions as directed by the Plant Manager. He/she is directly responsible for the records under his/her care. The Secretary/receptionist will answer the phone and ensure that plant personnel are properly contacted regarding facility business. He/she will receive visitors and will ensure that the visitor log is maintained.

**TABLE 7-5
JOB DESCRIPTIONS**

Plant Manager - The Plant Manager is responsible for overall management and production at the facility. He/she ensures that all waste handling operations are safely and correctly performed and that all regulatory requirements are met. He will ensure that the Contingency Plan is kept up to date and that employee training is performed in accordance with the approved training program. He will review all plant records, including the operating log and records of inspection and will ensure that this documentation is correctly performed and that records are maintained as specified by the permit and other applicable regulations.

Director of Training - The Director of Training is responsible for the administration of all operations and safety training programs. He/she will ensure that all company required operations training is performed and that training is properly documented. He will administer the HAZWOPER training and ensure that records are maintained in accordance with 29 CFR 1910.120, et. al. He will provide technical assistance to training instructors regarding personal protective equipment, industrial hygiene and related programs. For the foreseeable future, the Director of Training position will be filled by the Plant Manager.

General Foreman - The General Foreman directly supervises the carbon reactivation process, carbon handling operations, including warehousing, and other associated waste processing. He will instruct subordinate employees in the duties of their job and he will observe and evaluate their performance. He/she is directly responsible for the performance of operations in one or more specialty areas. He will inspect plant equipment and ensure that all plant systems, including alarm and emergency response systems are properly functioning.

Maintenance Supervisor - The Maintenance Supervisor is directly responsible for the operating condition of installed plant equipment and the physical condition of the entire facility. He will ensure that a schedule of routine maintenance is established and maintained, consistent with manufacturer's recommendations and good operating practices. He will ensure that adequate maintenance records are kept. He will train operating personnel, as necessary in the proper operation of installed equipment, to minimize downtime. He will respond to plant equipment breakdowns and other problems as required.

Maintenance Technician (Journeyman) - The journeyman will work under the direction of the Maintenance Supervisor to perform preventative and corrective maintenance. He will respond to plant breakdowns as required.

Maintenance Technician (Apprentice) - The apprentice will work under the direction of the maintenance journeymen in performing preventative maintenance and corrective maintenance on plant equipment. He will assist in maintaining the physical facility as required.

Environmental Compliance Manager - The Environmental Compliance Manager will work under the direction of the Corporate Environmental Health and Safety Director to ensure that all applicable environmental requirements are met. He/she will perform facility inspections and train other employees in the proper inspection of the facility. He/she will ensure that all environmental compliance records are properly maintained and that environmental reports are prepared for submittal in a timely fashion. He/she will assist the Plant Manager in responding to agency inquiries and will collect and record environmental data for the facility.

Environmental Coordinator - The Environmental Coordinator will handle customer waste profile applications and will coordinate and schedule delivery of spent carbon to the facility. He/she will maintain records for each customer regarding shipment and receipt of material. He/she will coordinate the shipment of reactivated carbon.

Laboratory Technician - The Laboratory Technician will perform routine waste screening analyses and will obtain samples and perform analyses related to process monitoring and environmental monitoring. He/she will assist in training other designated employees in obtaining samples. He/she will assist in reviewing waste profile applications and make recommendations as to whether wastes should be accepted. He/she will perform laboratory analyses on waste samples and process streams to determine plant operating parameters.

Lead Operator - The Lead Operator will be qualified to act as operator in charge of all equipment and processes on the work shift to which he is assigned. He/she will act under the direction of the General Foreman.

Operating Technician - The Operating Technician will operate plant treatment and waste handling equipment. He is responsible that his/her actions are properly performed and in accordance with established plant procedures and rules. He will inspect plant equipment and maintain documentation as directed by the Lead Operating Technician and the General Foreman.

Secretary/Receptionist - The Secretary/Receptionist will perform clerical functions as directed by the Plant Manager. He/she is directly responsible for the records under his/her care. The Secretary/receptionist will answer the phone and ensure that plant personnel are properly contacted regarding facility business. He/she will receive visitors and will ensure that the visitor log is maintained.

UPDATE '89

Medic First Aid



JEFF WALSH

has
completed

MEDIC FIRST AID — BASIC
(CPR/FIRST AID)

ISSUED *7-21-92* EXPIRES *7-21-93*

INSTRUCTOR *Michael J. Bennett*

Certificate of Completion

Jeff Walsh

Has Hereby Satisfactorily Completed

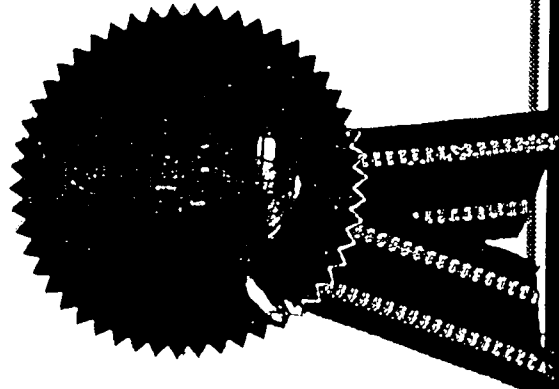
“BOOT CAMP”

Basic Training Course

Al Sae

Undersigned

Sept. 3, 1992
Date



CERTIFICATE OF TRAINING

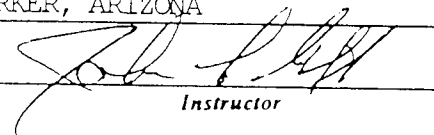
This is to certify that

JEFFREY S. WALSH

*has attended 40 hours of training
in accordance with the OSHA Hazardous Waste
Site Operators Training Curriculum (29 CFR 1910.120)*

facility WESTSTATE CARBON, INC, PARKER, ARIZONA

dated July 27-31, 19 92


Instructor

CERTIFICATE OF TRAINING

This is to certify that

JEFF WALSH

*has attended 8 hours of training
in accordance with the OSHA Hazardous Waste
Site Operators Training Curriculum (29 CFR 1910.120)*

8-HOUR SUPERVISOR TRAINING

facility WESTSTATE CARBON, INC., PARKER, ARIZONA

dated August 1, 19 92

[Signature]
Instructor

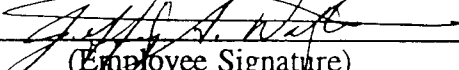
Figure 2-3
Employee Acknowledgement Form for Hazard Communication Training

Westates Carbon - Arizona, Inc.
Employee Acknowledgement of Hazardous Materials Training

I JEFFERY J. WALSH hereby acknowledge that I have received training regarding the hazardous materials known or expected to be in the assigned workplace in accordance with OSHA regulations for a Hazard Communication Program contained in 29 CFR 1910.1200.

The above training has included these subjects:

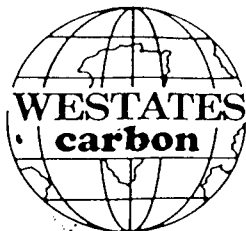
- Methods and observations that may be used to detect the presence or release of a hazardous chemical
- The physical and health hazards of the chemicals in the work area
- The measures employees can take to protect themselves from these hazards
- The details of the Westates Hazard Communication Program, including an explanation of the labeling system, location of Material Safety Data Sheets, and how employees can obtain and use the appropriate hazard information.

Signed: 
(Employee Signature)

Date: 10/19/92

Received: 
(Director of Training)

Date: 10-19-92



2130 LEO AVENUE • LOS ANGELES, CALIFORNIA • 90040-1634
TELEPHONE (213) 722-7500 • TWX 910-321-2355 • FAX (213) 722-8207

A Wheelabrator Technologies Company

MEMORANDUM

DATE: March 16, 1993
TO: Monte McCue
FROM: John Castillo
SUBJECT: Forklift Operator Training Course

As of March 12, 1993, Westates Carbon - Parker has been certified as OSHA trained forklift operators.

They were given two tests:

- 1 - Written test
- 2 - Performance test

The names of the successful candidates are listed on the following page.

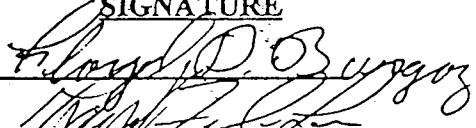

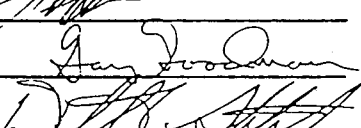
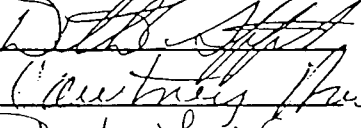
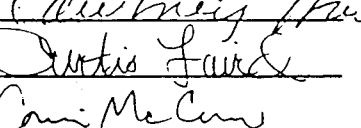
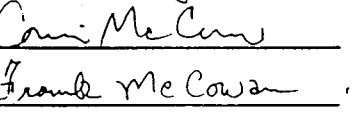
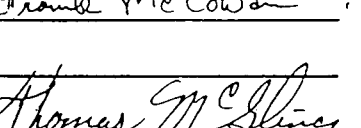
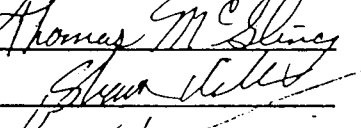
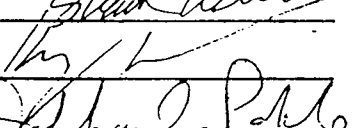
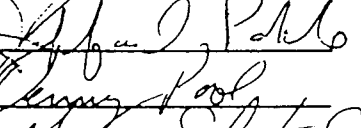
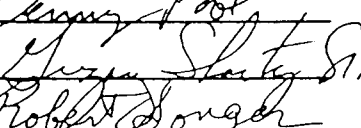
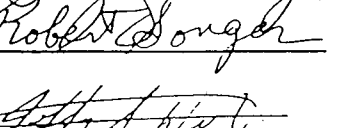
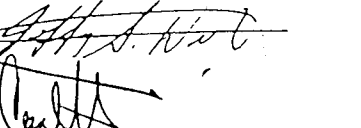
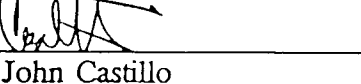



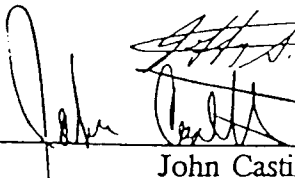
cc: B. Heath
D. Stanton
J. Walsh

JC:tgw
C:\WP51\FOTC.JC

RECEIVED MAR 22 1993

WESTATES CARBON, INC.
PARKER, ARIZONA

FORKLIFT OPERATORS
TRAINING COURSE

<u>EMPLOYEE NAME</u>	<u>SIGNATURE</u>	<u>DATE</u>
Floyd Burgoz		3-12-93
Ray DeLeon		3-12-93
Hector Duran		3-12-93
Gary Goodman		3-12-93
Delton Griffith		3-12-93
Courtney Harper		3-12-93
Curtis Laird		3-12-93
Corwin McCowan		3-12-93
Frank McCowan		3-12-93
Monte McCue		
Thomas McGlinchy		3/12/93
Shawn Miller		3/12/93
Kenneth Moore		3-12-93
Jefford Pablo		3-12-93
Denny Pool		3-12-93
Gregory Shortey		3-12-93
Robert Songer		3-12-93
Jerry S. Walsh		3/12/93
INSTRUCTOR: 	John Castillo	

MEMORANDUM

DATE: March 12, 1993

TO: File

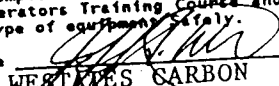
FROM: Jeff Walsh 

SUBJECT: Forklift Training

Employees of Westates Carbon-Arizona, Inc. attended a forklift training class on Friday morning, March 12, 1993. This class was directed by Mr. John Castillo of Westates Carbon in Los Angeles. We reviewed a video, took a written test and then performed on the forklift. All employees passed their examinations.

National Safety Council Forklift Truck Operators Safety Training Course

This is to certify that JEFFREY WALSH has
satisfactorily completed the National Safety Council
Forklift Truck Operators Training Course and is qualified
to operate this type of equipment safely.

Driver's Signature 

Company WESTATES CARBON

Department _____

Certificate

Jeffrey Walsh

Has Successfully Completed

HAZARDOUS MATERIALS MANAGEMENT TRAINING

and is certified in the following areas in compliance with DOT requirements to be trained and tested

General Awareness and Familiarization

Hazardous Materials Table

Packaging

Marking and Labeling

Shipping Papers

Placards

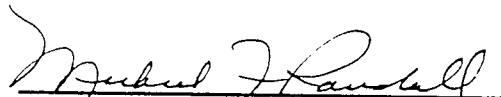
Loading, Unloading, and Stowing

Safe Handling of Hazardous Materials

Emergency Response

ENVIRONMENTAL RESOURCE CENTER

101 Center Pointe Drive, Cary, North Carolina 27513-5706


Micheal Randall, Instructor

16 July 1993

Date

Certificate No.: 17431

Occupational Safety and Health Consultants
A Certified Industrial Hygiene/Safety/Environmental Firm

Certifies that

J e f f r e y S . W a l s h

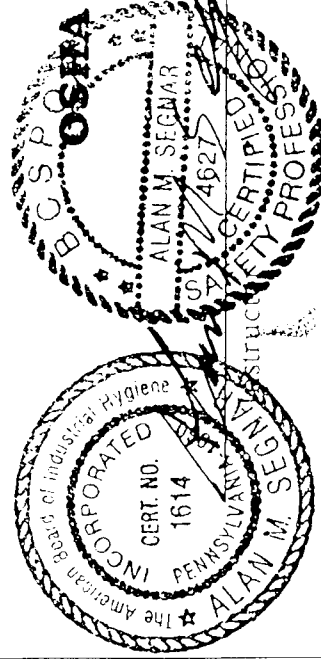
has successfully completed the required 8 hours of refresher instruction in:

Hazardous Materials Handling and Response

OSHA 29 CFR 1910.120

August 31, 1993

Date



Occupational Safety and Health Consultants

Certified Industrial Hygienists * Certified Hazardous Control Managers * Professional Engineers
Certified Hazardous Materials Manager * Certified Safety Professionals * Geologists and Hydrogeologists

September 7, 1993

Mr. Jeffrey S. Walsh
Environmental Health and Safety Manager
Westates Carbon Arizona, Inc.
A Wheelabrator Technologies Company
2523 Mutahar Street
P.O. Box E
Parker, Arizona 85344

Dear Jeff,

First, I want to thank you Monte, Mark, and the rest of the staff for the hospitality that has been extended to us during the last two weeks. We have sincerely enjoyed working with you and look forward to a continually mutual beneficial relationship in the future.

Please find attached the hearing conservation acknowledgements for Monte and Shawn. Also, when you get the chance, you should mail me one for you so that it will also be on record. Additionally, please find attached all certificates of completion for the 8 hour Hazwoper Refresher Course (OSHA 1910.120) and the Confined Space Entry Course (OSHA 1910.146).

The results for sampling for the tetraethyl lead and subsequent report will be forth coming as quickly as possible after we have received the analytical results from Roche Analytical Laboratory.

You might consider what your next training topic and/or program topic would be during our next visit. Of course we will provide any type of safety/industrial hygiene/environmental training that you desire. However, I might suggest that at least a portion of the program consist of performing the base line audiometric examinations. Of course, I will be speaking with you several times prior to our next actual visit which is anticipated at this point in time will be either late October or possibly November of 1993.

Again, I would like to state my sincere appreciation for the hospitality and consideration that was extended to us during the past two weeks and very much look forward to working with you in the future.

Occupational Safety and Health Consultants

A Certified Industrial Hygiene/Safety/Environmental Firm

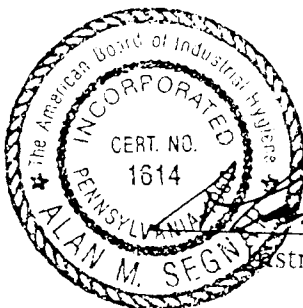
Certifies that

Jeffrey S. Walsh

has successfully completed the required instruction in:

Permit Required Confined Spaces

OSHA 29 CFR 1910.146



September 2, 1993

Date

WESTATES CARBON - ARIZONA EMPLOYEE JOB DESCRIPTION AND TRAINING RECORD

Employee Name: FRANK McCOWENJob Title: OPERATOR Hire Date: 07/20/92 Termination Date: _____Initial Training Completed: 09/01/92Dir. of Training Signature: MONTE McCUEOJT Completed: 09/18/92 (Hire Date Plus 8 Weeks)
***see operator responsibilities handbookDir. of Training Signature: MONTE McCUE

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____

Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks)

Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____

Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks)

Dir. of Training Signature: _____

Other Training

Type	Date	Signature of Trainer
Forklift	<u>03/12/93</u>	<u>JOHN COSTILLO</u>
First Aid	<u>07/20/92</u>	<u>MICHAEL BERNHARDT</u>
CPR	<u>07/20/92</u>	<u>MICHAEL BERNHARDT</u>

Type	Date	Signature of Trainer
<u>BOOT CAMP</u>	<u>07/92</u>	<u>SANDY MARSHALL</u>
<u>40 HOUR</u>	<u>07/92</u>	<u>JOHN GILSTRAP</u>
<u>HAZ COMM</u>	<u>10/19/92</u>	<u>MONTE McCUE</u>

NOTE: This form must be kept in the employee's personnel file for the duration of employment plus three years after the termination date.
If terminated, authorized destruction date: _____

WESTATES CARBON - ARIZONA **EMPLOYEE JOB DESCRIPTION AND TRAINING RECORD**

Employee Name: _____

Job Title: _____ F McCOWEN _____ Hire Date: _____ Termination Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Job Title: _____ Promotion Date: _____

Initial Training Completed: _____ Dir. of Training Signature: _____

OJT Completed: _____ (Hire Date Plus 8 Weeks) Dir. of Training Signature: _____

Other Training

Type	Date	Signature of Trainer	Type	Date	Signature of Trainer
Forklift	_____	_____	HEARING	08/25/93	ALAN SEGNA
First Aid	_____	_____	REFRESHER	09/01/93	ALAN SEGNA
CPR	_____	_____	CONFINED	09/02/93	ALAN SEGNA

NOTE: This form must be kept in the employee's personnel file for the duration of employment plus three years after the termination date.
 If terminated, authorized destruction date: _____

**TABLE 7-5
JOB DESCRIPTIONS**

Plant Manager - The Plant Manager is responsible for overall management and production at the facility. He/she ensures that all waste handling operations are safely and correctly performed and that all regulatory requirements are met. He will ensure that the Contingency Plan is kept up to date and that employee training is performed in accordance with the approved training program. He will review all plant records, including the operating log and records of inspection and will ensure that this documentation is correctly performed and that records are maintained as specified by the permit and other applicable regulations.

Director of Training - The Director of Training is responsible for the administration of all operations and safety training programs. He/she will ensure that all company required operations training is performed and that training is properly documented. He will administer the HAZWOPER training and ensure that records are maintained in accordance with 29 CFR 1910.120, et. al. He will provide technical assistance to training instructors regarding personal protective equipment, industrial hygiene and related programs. For the foreseeable future, the Director of Training position will be filled by the Plant Manager.

General Foreman - The General Foreman directly supervises the carbon reactivation process, carbon handling operations, including warehousing, and other associated waste processing. He will instruct subordinate employees in the duties of their job and he will observe and evaluate their performance. He/she is directly responsible for the performance of operations in one or more specialty areas. He will inspect plant equipment and ensure that all plant systems, including alarm and emergency response systems are properly functioning.

Maintenance Supervisor - The Maintenance Supervisor is directly responsible for the operating condition of installed plant equipment and the physical condition of the entire facility. He will ensure that a schedule of routine maintenance is established and maintained, consistent with manufacturer's recommendations and good operating practices. He will ensure that adequate maintenance records are kept. He will train operating personnel, as necessary in the proper operation of installed equipment, to minimize downtime. He will respond to plant equipment breakdowns and other problems as required.

Maintenance Technician (Journeyman) - The journeyman will work under the direction of the Maintenance Supervisor to perform preventative and corrective maintenance. He will respond to plant breakdowns as required.

Maintenance Technician (Apprentice) - The apprentice will work under the direction of the maintenance journeymen in performing preventative maintenance and corrective maintenance on plant equipment. He will assist in maintaining the physical facility as required.

Environmental Compliance Manager - The Environmental Compliance Manager will work under the direction of the Corporate Environmental Health and Safety Director to ensure that all applicable environmental requirements are met. He/she will perform facility inspections and train other employees in the proper inspection of the facility. He/she will ensure that all environmental compliance records are properly maintained and that environmental reports are prepared for submittal in a timely fashion. He/she will assist the Plant Manager in responding to agency inquiries and will collect and record environmental data for the facility.

Environmental Coordinator - The Environmental Coordinator will handle customer waste profile applications and will coordinate and schedule delivery of spent carbon to the facility. He/she will maintain records for each customer regarding shipment and receipt of material. He/she will coordinate the shipment of reactivated carbon.

Laboratory Technician - The Laboratory Technician will perform routine waste screening analyses and will obtain samples and perform analyses related to process monitoring and environmental monitoring. He/she will assist in training other designated employees in obtaining samples. He/she will assist in reviewing waste profile applications and make recommendations as to whether wastes should be accepted. He/she will perform laboratory analyses on waste samples and process streams to determine plant operating parameters.

Lead Operator - The Lead Operator will be qualified to act as operator in charge of all equipment and processes on the work shift to which he is assigned. He/she will act under the direction of the General Foreman.

Operating Technician - The Operating Technician will operate plant treatment and waste handling equipment. He is responsible that his/her actions are properly performed and in accordance with established plant procedures and rules. He will inspect plant equipment and maintain documentation as directed by the Lead Operating Technician and the General Foreman.

Secretary/Receptionist - The Secretary/Receptionist will perform clerical functions as directed by the Plant Manager. He/she is directly responsible for the records under his/her care. The Secretary/receptionist will answer the phone and ensure that plant personnel are properly contacted regarding facility business. He/she will receive visitors and will ensure that the visitor log is maintained.

Certificate of Completion

Frank McGowan

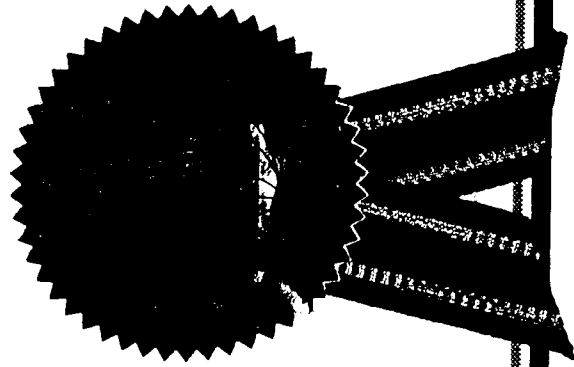
Has Hereby Satisfactorily Completed

“BOOT CAMP”

Basic Training Course

All Sars
Undersigned

Sept. 3, 1992
Date



UPDATE '89

Medic First Aid®



FRANK McCOWAN

has
completed

MEDIC FIRST AID — BASIC
(CPR/FIRST AID)

ISSUED *7-20-92* EXPIRES *7-20-93*

INSTRUCTOR *Michael J. Barnhart*

CERTIFICATE OF TRAINING

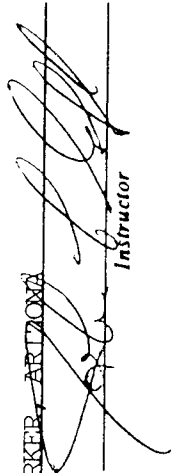
This is to certify that

FRANK MCCOWAN

*has attended 40 hours of training
in accordance with the OSHA Hazardous Waste
Site Operators Training Curriculum (29 CFR 1910.120)*

facility WESTSTATE CARBON, INC., PARKER, ARIZONA

dated July 27-31, 19 92


Instructor

FRANK McGOWAN
January 29, 1993
Operator

OPERATOR and ASSISTANT OPERATOR RESPONSIBILITIES

1. Record readings for Monitor Log on 15 minute intervals. Record keeping is extremely important - it must be done religiously.
2. Complete daily routine checklist/cleanup.
3. Fill out Spill Report when required. This includes:
 - A) Spills from T-9
 - B) Spills from hoppers
 - C) Spills from D/W screw
 - D) Spills from T-8
 - E) Any other spill of hazardous material
4. Fill out Daily Inspection Report in detail and insure the information gets passed on to Delton Griffith so it can be corrected. If the problem can be corrected by an Operator it should be taken care of and logged on the sheet.
5. Label all drums as they are filled. *All drums must have a label at all times.* These labels must contain the time filled, contents, date, where material came from and who filled it. The drums themselves must be labeled. The labeling of lids is not satisfactory.

Note: Hazardous and Non-Hazardous Material will have to be labeled different (see attached labels for example).

6. Inspect all equipment on regular intervals. This list includes:
 - A) Spent carbon tanks and eductors
 - B) Both recycle pumps (P4 and P5)
 - C) T-12 and T-9 levels
 - D) Slurry lines from storage tanks to T-8
 - E) T-8 and overflow lines
 - F) CV-5 feed valve
 - G) Dewater screw (motor, screw, packing, etc.)
 - H) Furnace (this includes the sand seals)
 - I) Cooling screw (screw, motor, gear box, etc.)
 - J) C-3 transporter. Ensure it is cycling properly and that the carbon temperature remains above 175°F.
 - K) S-1 level - shifts must screen their own production.
 - L) Vibratory feeder. The carbon must be screened as slow as possible to prevent carry over on screens. Do not wait until the last part of the shift to screen. Screening the material too fast will cause off-spec screen analysis and make a product that is unsaleable.



- M) Label bags properly (see attached sheet).
- N) Make certain the transporter is set to the proper tank (S2, S3, S4).
- O) Maintain desired temperatures in the furnace.

VAPOR PHASE (Coconut)

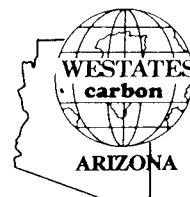
Zone 1 - 1650°F
 Zone 2 - 1600°F
 Zone 3 - 1250°F
 Zone 4 - 1950°F

LIQUID PHASE (Coal)

Zone 1 - 1800°F
 Zone 2 - 1750°F
 Zone 3 - 1350°F
 Zone 4 - 1950°F

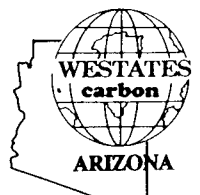
- P) Check and make certain scrubber pump is putting out the correct pressure. This would be 17-22 psi without bleeding and 13-16 psi if bleeding to POTW.
- Q) Check sprays in quench and venturi. The air temperature after the venturi should run between 175-185°F on the thermometer. If the pump goes down or water is lost, the I.D. fan must be shut down as soon as possible to avoid melting the packing in the scrubber. *The packing material must not exceed 210°F.*
- R) Check venturi pressure regularly to insure particulate is being removed. The pressure drop across the venturi corresponds to the size of particulate in the air stream that the venturi will remove. The higher the pressure drop, the smaller size of particulate it will remove.
- S) Check I.D. fan for vibration.
- T) Check stack at least every 15 minutes to insure it is clean. The only discharge should be steam. If the stack is not clear notify Management at once.
- U) Check T-17 on a regular basis to insure high and low level switches are working.
- V) Insure POTW bleed is within parameters:
 - 1) pH - 6.0-8.0
 - 2) Temperature - less than 140°F
 - 3) TDS - Less than Delta 400

Note: Day shift operator must take the incoming TDS each morning and write it on the board with the Delta 400 limit.
- X W) If T-9 happens to overflow either stop the overflow or notify Management. If it does overflow a Spill Report must be completed.
- X) The inside and outside sump must be clean and free of carbon and water at all times.
- Y) The pad, both inside and out, must be free of carbon or other debris at all times.
- Z) The control room must be clean (i.e. computer, file cabinets, desks, burner panel, PLC, etc. must be wiped down and the floor clean.)
- AA) Inspect boiler and compressor routinely.
- AB) Inspect baghouse discharges on a regular basis along with pressure drop



- across the bags. The pressure drop should be 7-10" w.c.
- AC) Inspect and change if necessary the filters on the two combustion fans and the shaft cooling air fan.
 - AD) Blow down steam trap every 15 minutes.
 - AE) Blow down in-line compressed air filter and tank once per shift.
7. All bags loaded (4 x 10 or 8 x 30) must be labeled properly. The bag number must be correct along with the sample. The bag must also be stenciled in an orderly fashion.
8. The work hours are:
- | | |
|---------------|-------------------------|
| Day Shift | 6:00 a.m. to 2:30 pm. |
| Evening Shift | 2:00 p.m. to 10:30 p.m. |
| Night Shift | 10:00 p.m. to 6:30 a.m. |
- The lunch time of 30 minutes is not paid. All employees are required to punch out and in for lunch. If plant emergencies arise that do not allow an individual to take lunch the 30 minutes will be paid. In addition, two (2) 10-minute breaks will be given for each employee each shift (this is paid). The employee is required to punch out and in for this time also. A walk time of 2-minute (this includes wash-up time) to the trailer and 1-minute back will be allowed so break time will be a total of 13 minutes. Wash-up includes face and hands and clothes must be relatively clean.
9. The last half-hour of the day of each shift (2:00-2:30 p.m., 10:00-10:30 p.m., 6:00 - 6:30 p.m.) will be used to brief the oncoming shift, shower and clean up the locker room. It is each person's responsibility to make certain the locker room is left in order.
10. The Operators are responsible for security of the plant on off-shifts and on weekends. The gates must remain locked and only authorized personnel will be let in. Authorization must come from Westates Carbon-Arizona, Inc. Management. The automobile gate to the office must also be locked during off-shifts and weekends.
11. Although it is not expected and will not be a norm Operators may be required to load or offload trucks on off-shifts or weekends.
12. If an employee does not report out before the end of a shift, he/she was scheduled to work, he/she will not be allowed to work the next shift.

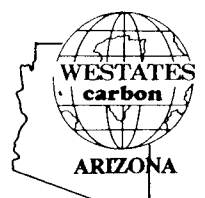
Example: Joe was scheduled to work Monday Day Shift. If he is not at work Monday he has until 2:30 p.m. (the end of his shift) on



Monday to report out and back in for his next scheduled shift. If Joe does not report before 2:30 pm. he will not be allowed to work his next scheduled shift (which is Tuesday Day Shift).

It is the responsibility of the Operator working to insure this is logged properly in the logbook with the time called in.

13. Although the Plant Foreman is responsible for Operators, Assistant Operators and Maintenance Personnel, it should not be construed to mean that another member of WCAI Management (i.e. Plant Manager, Environmental Coordinator, Environmental Manager or Lab Supervisor) cannot request a task to be done.
14. Respirator wear is mandatory when taking feed rate measurements at dewatering screw as is the wearing of rubber gloves.
15. If T-9 should overflow rubber boots are mandatory along with respiratory wear if you must wade through standing water to turn on the pump.
16. When working around the acid or caustic drums (changes barrels, etc.) respiratory full-face or half-face with face shield wear is mandatory along with rubber gloves.
17. With the exception of the control room, hard hats, safety glasses and steel-toed boots are required in the plant. When working on the furnace discharge pipe gloves and a face shield are required.
18. Personnel are required to keep their personal protective equipment (PPE) clean (i.e. respirators, hard hats, clothes, boots). The respirators should be checked on a regular basis for cartridges, straps, face shield and to ensure it is free from dust or dirt.
19. All personnel are required to fill out a confined entry permit before entering a tank or vessel. Proper planning of escape routines and emergencies must be discussed before the job is carried out. Examples could be the furnace, T-17, storage tanks, packed bed scrubber or carbon vessels.
20. Personnel must be clean shaven at the start of each shift. Facial hair may not interfere with the seal of the respirator.
21. All employees are required to report accidents or first aid cases immediately.
22. The Operator assumes responsibility for plant operations during his shift. He also is responsible for the actions of the Assistant Operator.



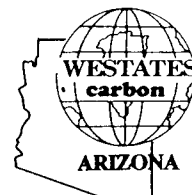
23. The Operator and Assistant Operator are responsible for knowing the quality of carbon reactivated (i.e. CTC or Iodine numbers).
24. This list is not be taken as a complete list and may be modified with time as needed.

ACKNOWLEDGEMENT OF RECEIPT
OPERATOR and ASSISTANT OPERATOR RESPONSIBILITIES

I have received and understand these requirements.

Frank Mc Cowan
Signature

January 29, 1993
Date



WESTATES CARBON-ARIZONA, INC.

2523 Mutahar Street

Post Office Box E

Parker, AZ 85344

DATE OF RELEASE: 1-22-93

TIME OF RELEASE: 10:30 AM

TYPE OF RELEASE: ☒ Solid Within Containment
☐ Solid Outside Containment
☒ Liquid Within Containment
☐ Liquid Outside Containment (Less than 15 gallons)
☐ Liquid Outside Containment (More than 15 gallons)

LOCATION OF RELEASE: OVERFLOW FROM DEWATER SCREW

CORRECTIVE ACTIONS TO STOP RELEASE: TURNU OFF FEED AND FOUND
OVERFLOW SCREEN PLUGGED WITH FINE CARBON. CLEANED SCREEN.

MATERIALS USED TO CONTAIN RELEASE: PERSONAL PROTECTIVE EQUIPMENT
USED WAS A REPIRATOR AND RUBBER GLOVES. THE SPILL WAS WASHED TO THE
SUMP AND PUMPED TO THE RECYCLE WATER TANK (T-9).

DEVIATIONS FROM CONTINGENCY PLAN: NONE.

Operator: JOHN DOE

Assistant Operator: JOE SMITH

HAZARDOUS WASTE

STATE AND FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY, THE U.S. ENVIRONMENTAL PROTECTION AGENCY
OR THE CALIFORNIA DEPARTMENT OF HEALTH SERVICES

GENERATOR INFORMATION:

NAME WESTATES CARBON-ARIZONA INC.

ADDRESS 2523 MUTAHAR PHONE 602-669-5758

CITY PARKER STATE ARIZONA ZIP 85344

EPA ID NO. AZD982441263 MANIFEST DOCUMENT NO. N/A

EPA WASTE NO. D018 CA WASTE NO. N/A ACCUMULATION START DATE 1-25-93

CONTENTS, COMPOSITION: BENZENE

PHYSICAL STATE: ☐ SOLID ☒ LIQUID | HAZARDOUS PROPERTIES: ☐ FLAMMABLE ☒ TOXIC
☐ CORROSIVE ☐ REACTIVE ☐ OTHER

[OVERFLOW FROM T-9 (RECYCLE WATER)]

[D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX]

HANDLE WITH CARE!

Lab Safety Supply, Inc., Janesville, WI 53547

Reorder No. 20648

EXAMPLE OF HAZARDOUS WASTE LABEL

EXAMPLE OF NON-HAZARDOUS LABEL

Generator: WCAI	Date Received: 1-25-93
Contact, Title, Phone: JEFF WALSH 602-669-5758	
Approval Number: N/A	Waste Tally Number: N/A
Quantity: 1 DRUM	Type of Carbon: 4X8 VAPOR
Batch Number: 25012593	Pad Number: N/A
Type of Container: DRUM	Received by: N/A
Comments: SPILLAGE FROM C-3 TRANSPORTER (NON-HAZARDOUS)	

DAILY ROUTINE CHECKLIST

[illegible]

Figure 2-3

Employee Acknowledgement Form for Hazard Communication Training

Westates Carbon - Arizona, Inc.
Employee Acknowledgement of Hazardous Materials Training

I FRANK McCOWAN hereby acknowledge that I have received training regarding the hazardous materials known or expected to be in the assigned workplace in accordance with OSHA regulations for a Hazard Communication Program contained in 29 CFR 1910.1200.

The above training ahs included these subjects:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical
- The physical and health hazards of the chemicals in the work area
- The measures employees can take to protect themselves from these hazards
- The details of the Westates Hazard Communication Program, including an explanation of the labeling system, location of Material Safety Data Sheets, and how employees can obtain and use the appropriate hazard information.

Signed:

Frank McCowan
(Employee Signature)

Date:

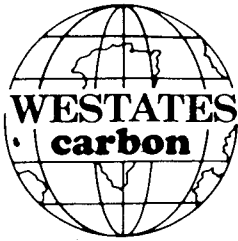
10-19-92

Received:

Walter W. C.
(Director of Training)

Date:

10-19-92



2130 LEO AVENUE • LOS ANGELES, CALIFORNIA • 90040-1634
TELEPHONE (213) 722-7500 • TWX 910-321-2355 • FAX (213) 722-8207

A Wheelabrator Technologies Company

MEMORANDUM

DATE: March 16, 1993
TO: Monte McCue
FROM: John Castillo
SUBJECT: Forklift Operator Training Course

As of March 12, 1993, Westates Carbon - Parker has been certified as OSHA trained forklift operators.

They were given two tests:

- 1 - Written test
- 2 - Performance test

The names of the successful candidates are listed on the following page.

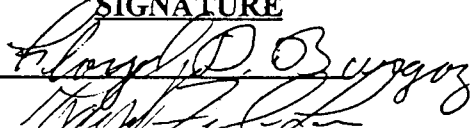
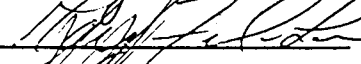

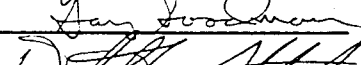

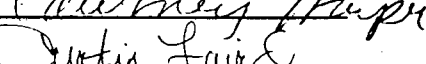
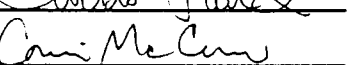
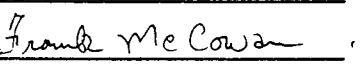

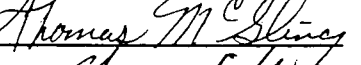
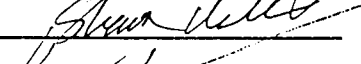

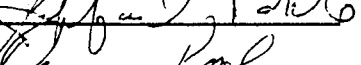
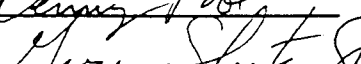

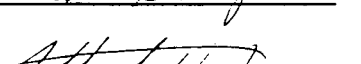
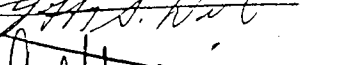
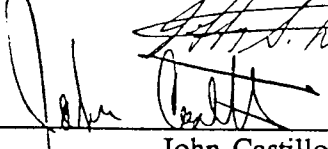
cc: B. Heath
D. Stanton
J. Walsh

JC:tgw
C:\WP51\FOTC.JC

RECEIVED MAR 22 1993

WESTATES CARBON, INC.
PARKER, ARIZONA

FORKLIFT OPERATORS
TRAINING COURSE

<u>EMPLOYEE NAME</u>	<u>SIGNATURE</u>	<u>DATE</u>
Floyd Burgoz		3-12-93
Ray DeLeon		3/12/93
Hector Duran		3-12-93
Gary Goodman		3-12-93
Delton Griffith		3-12-93
Courtney Harper		3/12/93
Curtis Laird		3-12-93
Corwin McCowan		3-12-93
Frank McCowan		3-12-93
Monte McCue		
Thomas McGlinchy		3/12/93
Shawn Miller		3/12/93
Kenneth Moore		3-12-93
Jefford Pablo		3-12-93
Denny Pool		3-12-93
Gregory Shortey		3-12-93
Robert Songer		3-12-93
JERRY S. WALSH		3/12/93
INSTRUCTOR: 	John Castillo	

Occupational Safety and Health Consultants

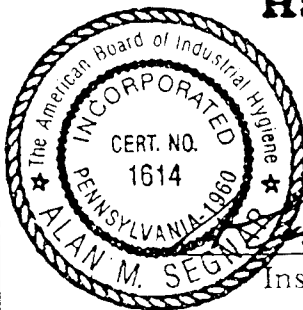
A Certified Industrial Hygiene/Safety/Environmental Firm

Certifies that

F r a n k M c C o w a n

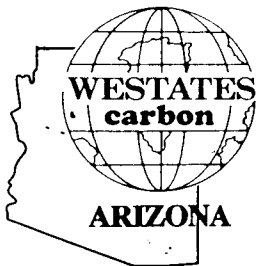
has successfully completed the required 8 hours of refresher instruction in:

Hazardous Materials Handling and Response



September 1, 1993

Date



2523 MUTAHAR STREET • P.O. BOX E • PARKER, AZ 85344
TELEPHONE (602) 669-5758 • FAX (602) 669-5775

A Wheelabrator Technologies Company

Westates Carbon-Arizona, Inc.
Employee Acknowledgement of Hearing Conservation

I FRANK Mc COWAN hereby acknowledge that I have received training regarding the noise known or expected to be in the assigned workplace in accordance with OSHA regulations contained in 29 CFR 1910.95.

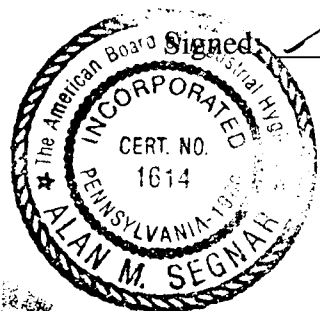
The above training has included:

- 1) Viewing of the "Stick in Your Ear" video.
- 2) Thoroughly read the Hearing Conservation Plan.
- 3) Reviewed findings from June 15 - 17, 1993 monitoring.
- 4) Have been instructed where and when to wear hearing protection.
- 5) Have received hearing protection devices.

Signed: Frank Mc Cowan Date: Aug 25, 1993
Employee

Signed: [Signature] Date: 8/25/93
Environmental Health & Safety Manager

Signed: Alan M. Segnar Date: 08 25 93
Industrial Hygienist



Occupational Safety and Health Consultants

A Certified Industrial Hygiene/Safety/Environmental Firm

Certifies that

Frank McCowan

has successfully completed the required instruction in:

Permit Required Confined Spaces

OSHA 29 CFR 1910.146

September 2, 1993

Date

